

From: [ANDERSON Jim M](#)  
To: [Rene Fuentes/R10/USEPA/US@EPA](#); [MCCLINCY Matt](#)  
Cc: [Eric Biltschke/R10/USEPA/US@EPA](#); [ANDERSON Jim M](#); [Kristine Koch/R10/USEPA/US@EPA](#)  
Subject: RE: Round 2 Comp Report CSM Comments  
Date: 10/14/2008 02:59 PM

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Rene,

I understand your concern & we want to make the Thurs mtg as productive as possible. So, here's what DEQ would like to discuss in our Thurs mtg. DEQ has 1 general concern with EPA's comments & a number of concerns about individual sites. We're still finalizing our review of the document, & are pretty close to being done..., but here are the general concerns & concerns with specific sites.

**General Concern**- EPA doesn't agree with the "H\*" designator that the LWG proposes for many site. Does EPA have an alternative?

**Specific Sites**

- 1) Comment 123, ACF- 1st, DEQ believes GW was adequately characterized. Let's discuss this in our Thurs mtg. 2<sup>nd</sup>, we're not sure we understand EPA's comment re: stormwater. It sounds like EPA is saying that if there's any current or future stormwater discharge from a site..., it's "C?".
- 2) Comment 124, Arkema- DEQ wants to further discuss the VOCs in riverbank erosion pathway with EPA during the Thurs mtg.
- 3) Comment 125, Burgard- DEQ has an ongoing stormwater source control evaluation (SCE) at the site. EPA recommends "C", but we would say "C?". I assume you're basing your call on LWG stormwater data, which is OK..., but where are the hits in WR-123 (OF18) coming from?
- 4) Comment 127, NW Pipe- Saturation limit for PCE is 200ppm, & max PCE concentration at NW Pipe has been 2.8 ppm. This was a 1 time occurrence, & GW concentrations have dropped below <1% of saturation limit.
- 5) Comment 130, Calbag- DEQ maintains stormwater should be "C?". We understand the City sed trap data show PCBs >SLVs, but the City doesn't have any loading data..., concentration only. We believe the RP took reasonable source control measures & implemented BMP & knocked down both concentration & mass. DEQ is considering requiring the new o/op to camera survey the lines to check for accumulated sed, & then re-clean CBs & lines.
- 6) Comment 138, Front Ave Properties- EPA recommends changing

riverbank erosion from “c” to “b”, saying there sufficient data to show there’s at least a likely pathway. What data?

7) Comment 139, Gasco- EPA recommends changing the overland pathway from “d” to “a” & “H,C?”. Our previous Milestone Rpts listed this pathway as “N/A”. We maintain the overland pathway is much less significant than other contaminant transport pathways at Gasco, but we agree with EPA that this pathway was & still may be complete. We agree with EPA’s recommendation of “a” & “H,C?”, & will change our next Milestone Rpt to reflect this decision.

8) Comment 148 & 149, MarCom N & S- EPA recommends changing the MarCom N overland pathway should be “b” “H”. We agree with the “H”, but believe the upland source control measures the Port recently completed..., make the pathway a “d”, not “b”.

9) Comment 150, Marine Finance- 1<sup>st</sup>, EPA recommends changing the stormwater pathway from “c” to “b”. We believe the SCE & source control measures closed the stormwater pathway out & it should be “d”. 2<sup>nd</sup>, EPA recommends changing the overland pathway from “c” & “H?” to “b” and “H?,C?”. We believe the SCE & source control measures closed the overland pathway out & it should be “d”. 3<sup>rd</sup>, EPA recommends changing the riverbank erosion pathway from “H” to “H,C”. We believe the SCE & source control measures close the river bank pathway & it should be “H”.

10) Comment 153, OSM- EPA recommends the stormwater/wastewater pathway should be “H,C”. We agree with the “H”, but given the recent stormwater SCMs, shouldn’t it be “C?”?

11) Comment 155, T1S- EPA maintains that the stormwater pathway is “c” & “H,C”. We believe the CU we did removed both surficial & subsurface contaminated soil & placed clean fill over the excavated areas. We maintain the stormwater pathway is “d” & “H”.

12) Comment 157, T4 ASA- EPA recommends the riverbank erosion pathway should be “c”. In EPA’s 6/04 comments on our draft source control decision, they said “the site does not appear to be a current source of contamination to the river”. We maintain the stormwater pathway is “d”.

13) Comment 158, T4 Slip 1- EPA recommends the stormwater pathway should be “b” & “H,C”. Since we have a stormwater SCE ongoing, we consider the stormwater pathway to be “c”. Is EPA using LWG stormwater data to support their call of “b” & “C”? If so, we agree with that call.

14) Comment 164, Aire Liquide- EPA recommends the stormwater pathway should be "a" & "C?". This site isn't in DEQ CU Program yet. What evidence is EPA using to support their decision (104e information?)? If so, we agree with that call.

15) Comment 165, Schnitzer Kittridge- EPA recommends changing the stormwater/wastewater pathway from "H" to H,C?". DEQ closed the site saying stormwater was insignificant. EPA agreed with our draft SCD & said "EPA may revisit should new data/information become available..." Is there new data/information?

16) Comment 166, Shaver Transportation- EPA (Kristine?) notes that EPA didn't make the noted "EPA Comment" for either the overwater or the riverbank pathways. Who did, & is it an open concern? EPA (Tara M) reviewed DEQ draft SCD in 2/03 & agreed the site was a low priority. DEQ NFA'ed the site in 6/03. I suppose DEQ could support EPA's recommendation to say the riverbank pathway is "c", but that doesn't match our Milestone Rpt.

17) Comment 174, Willamette Cove- EPA recommends changing the GW pathway from "C" to "H/C". Since there a GW SCE ongoing, DEQ recommends it be "c".

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-----Original Message-----

From: Fuentes.Rene@epamail.epa.gov

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Sent: Tuesday, October 14, 2008 11:32 AM

To: MCCLINCY Matt

Cc: Blischke.Eric@epamail.epa.gov; ANDERSON Jim M;

Koch.Kristine@epamail.epa.gov; LACEY David

Subject: Re: Round 2 Comp Report CSM Comments

Matt,

Since it seems i am bound to meet with you on the Chapter 11 (mind you that the title is not a good one on these times of financial turmoil) then i would like you to give us a more detailed list of the topics,

preferably today or Wednesday early morning at the latest. It is impossible for me (us ?) to prepare to meet with you if I cannot research it prior to meeting. And Thursday is already booked on a car trip, so we need to move the planning to today or tomorrow. Can you help with that? It would help to understand at least which sites are in your list for re-discussion.

Rene

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Matt"

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10/13/2008 10:13  
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Subject

Round 2 Comp Report CSM

Comments

Kristine,

Jim and I are ready to discuss the LWG responses to comments on the Round 2 Comp Report CSM (Chapter 11). Would you be available to discuss them after our meeting on the RPAC groundwater plume the afternoon of Oct. 16th? I was thinking that we could meet on RPAC from

1:00 to 2:30 or 3:00, and then meet on Chapter 11. If this does not work for you, what does the following week look like?

By the way, Dave Lacey is working on getting a draft letter or discussion points out to you for our meeting on the RPAC groundwater

plume.

Matt McClincy

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